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9 *Counsel for J.R. Simplot Company, dba Simplot Western Stockmen's*

10  
11 **UNITED STATES BANKRUPTCY COURT**  
12 **EASTERN DISTRICT OF WASHINGTON**

14 IN RE:

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17 EASTERDAY RANCHES, INC.,

18  
19  
20 Debtor.

21 Case No. 21-00141-WLH11

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33  
34 **JOINDER IN WEYN'S &**  
**SUNRAY'S RESPONSE IN**  
**SUPPORT OF MOTION FOR**  
**ADEQUATE PROTECTION**

BAILEY  BUSEY

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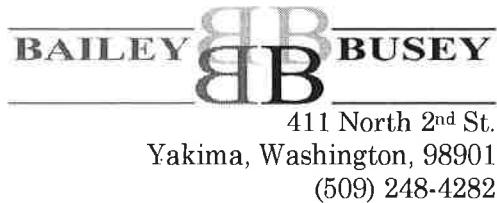
Joinder

-1-

1 J.R. Simplot Company, dba Simplot Western Stockmen's ("Simplot")  
2  
3 hereby joins in the response of Weyns Farms and Sunray Farms [ECF 563] to  
4 the objections filed by the Unsecured Creditors' Committee and Washington  
5 Trust Bank. Simplot has filed a joinder in the original motion for adequate  
6 protection as Simplot is a feed supplier that has a perfected preparer's lien  
7 under RCW 60.13.  
8  
9

10  
11 1. Simplot delivered corn feed ("**Farm Products**") to the Debtors.  
12  
13 Simplot's preparer's lien attached and was automatically perfected upon  
14 delivery of the Farm Products under RCW 60.13.030. The perfected  
15 preparer's lien provides for super priority for a period of 20 days after  
16 payment is due and remains unpaid.  
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19  
20 2. The Debtors remain indebted to Simplot for the unpaid amounts  
21 due under the Contract and invoices ("**Remaining Balances**"). The  
22 Remaining Balances were due on January 15, 2021 for all Farm Products.  
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3. After the Debtors failed to pay, Simplot filed a preparer lien claim with the Washington State Department of Licensing on February 4, 2021 (DOL Filing No. 2021-035-4712-7).

6       4.     Simplot has reviewed the Response in Support of Motion for  
7  
8 Adequate Protection and joins in the Response seeking the same remedy as  
9  
10 requested in the original motion.

DATED this 14<sup>th</sup> day of April, 2021.

/s/ Joshua J. Busey  
Joshua J. Busey (WSBA 34312)  
Bailey & Busey PLLC



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